

Exhibit 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

RELIABLE CARRIERS, INC.,

Plaintiff,

Case No. 2:17-cv-10971

v.

Judge Sean F. Cox
Mag. Judge David R. Grand

MOVING SITES, LLC,

Defendant.

**DECLARATION OF ANDREW WASH
IN SUPPORT OF MOVING SITES'S MOTION TO DISMISS**

I, Andrew Wash, declare as follows:

1. I am over 18 years of age and competent to make this declaration. I have personal knowledge of the statements made in this declaration, and if called as a witness I could competently testify to them.

2. I am the Chief Executive Officer of Moving Sites, LLC ("Moving Sites"). In this role I am responsible for all managerial and business decisions. I am intimately aware of Moving Sites' business including its products, customers and finances.

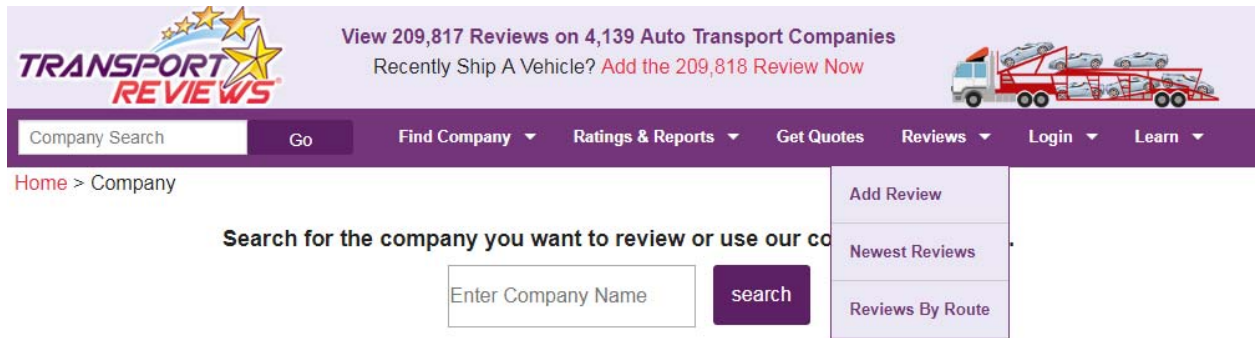
Moving Sites' Community Website Business

3. Moving Sites is an operator of over 30 community websites designed to provide customers with information about various companies within a variety of industries. These websites include:

- TruckRepair.com;
- Towing.com;
- Roadsideservice.com;
- HeavyDuty.com;
- Moving Company.com;
- Moverreviews.com;
- Cartransport.com; and
- Transportreviews.com

4. Moving Sites provides these forums for the creation of community-generated content. Specifically, these forums facilitate the provision of contact information about various companies within the industry and allow customers to provide reviews of those companies in real time.

5. While Moving Sites creates and hosts its review websites, the content on the websites are created by visitors to the websites. Specifically, information about individual companies is provided by customers when they submit a review. For example, if a customer wanted to review Joe's Awesome Transport Company, they would select the "add a review" link from the "Reviews" drop-down menu as shown below:



TRANSPORT REVIEWS

View 209,817 Reviews on 4,139 Auto Transport Companies
Recently Ship A Vehicle? [Add the 209,818 Review Now](#)

Company Search Find Company ▾ Ratings & Reports ▾ Get Quotes Reviews ▾ Login ▾ Learn ▾

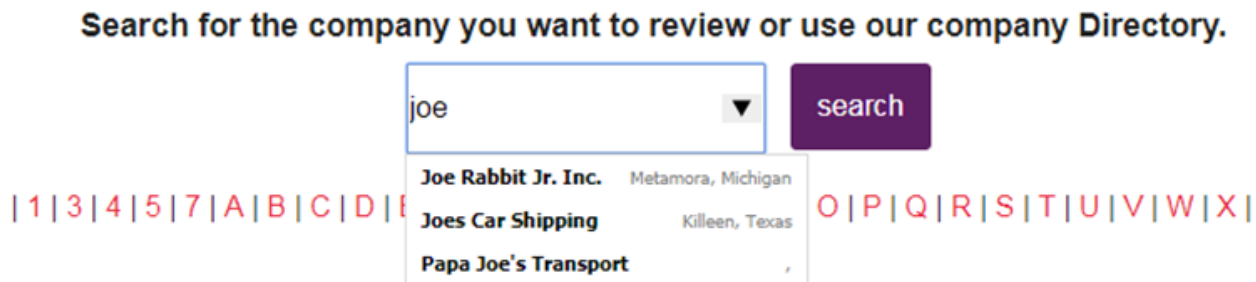
[Home](#) > Company

Search for the company you want to review or use our company Directory.

Enter Company Name

Add Review
Newest Reviews
Reviews By Route

6. If a company has been reviewed before, that name may appear in a drop down menu as shown below:



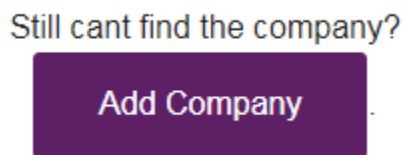
Search for the company you want to review or use our company Directory.

joe ▾

1 | 3 | 4 | 5 | 7 | A | B | C | D | E | F | G | H | I | J | K | L | M | N | O | P | Q | R | S | T | U | V | W | X | Y | Z

Joe Rabbit Jr. Inc. Metamora, Michigan
Joes Car Shipping Killeen, Texas
Papa Joe's Transport

7. If that Company has not been reviewed before, a customer will be given the option to add the company to the industry database:



Still cant find the company?

8. The “Add Company” link will allow the user to provide information about the company such as the name, contact information and website:

Company Name (required):

Email(required):

Phone Number (required):

Website

MC Number

Address 1

Address 2

City

State

ZipCode

Ex. A, <https://www.transportreviews.com/AddReview/AddCompany>

9. Once the user fills out the requisite information and clicks the “Add Company” link, the company will be added to the industry directory and can be subsequently reviewed by other users. The Company will appear in the industry directory as soon as the user submits it. Importantly, the company name will appear exactly as the user entered it. Moving Sites does not check or confirm the

accuracy of the information provided by the customer before it is listed on the websites.

10. Moving Sites does not validate the company directory or the reviews. However, Moving Sites endeavors to provide useful, quality information for customers. To this end, because Moving Sites understands that some reviews are posted by a customer who has a complaint or issue, Moving Sites allows companies to submit rebuttal reviews. Moving Sites periodically checks to see whether companies are posting fake positive reviews, however, this check is done using back end tracking data, not the claims of the review.

11. Moving Sites has the ability to hide reviews from public view (e.g., not visible to any user, customer or company). Reviews are hidden if they violate Moving Sites' terms of service, including reviews that contain offensive content, are submitted by anonymous or unverified users, and/or are submitted by a non-customer.

12. There is no cost to visitors, customers, reviewers or auto transport companies to use the directory and review portions of Moving Sites' websites.

13. Moving Sites does not earn money when customers input a company name in the industry directory or in a consumer review.

14. Moving Sites' only commercial service is the provision of its community websites. Moving Sites does not provide any automobile transportation services, or any other service.

The Transport Reviews Community Website

15. Moving Sites operates the website www.transportreviews.com, a community website which allows the public to share and obtain information about companies that provide automobile transportation services (the "Transport Reviews Website"). This information includes an auto transport company directory, company ratings and reports, a quote submission process, transport duration calculator, and, customer review listings. In this way, the Transport Reviews Website operates as a public version of the Better Business Bureau, or similar to review sites such as Angie's List and Yelp!.

16. As explained above, companies are included in an "auto transport company directory" if a consumer has submitted a review for that company. Moving Sites does not create or confirm the accuracy of the information in the auto transport company directory before it appears on the website.

17. Moving Sites provides several disclaimers regarding the content that appears on the Transport Reviews Website. The first disclaimer appears at the bottom of every webpage:

The reviews posted on this site are posted by those who claim to be customers of the auto transport company that reviewed. Their opinions are theirs.

Companies and visitors are responsible for deciding on companies independent of the visitor information on Transport Reviews. Please alert us to potential false reviews or reviews not posted by a real customer. To report misuse of this site please contact us.

See Ex. B, <https://www.transportreviews.com/>

18. A second disclaimer appears on the “About Transport Reviews” webpage:

General Site Info

When viewing the information on TransportReviews.com or any review sites owned by Moving Sites, LLC. it is important to realize that the reviews and ratings on this site are supplied by people who claim to be customers of the auto transport company they are reviewing. Moving Sites, LLC. and TransportReviews.com do not create any of the content of the reviews. The reviews and ratings are based on the experience and opinions of the person who wrote the review.

Third Party Use of the term “Reliable” on the Transport Reviews Website

19. I understand that Reliable alleges that Moving Sites is liable for trademark infringement because the term “reliable” in names of businesses in the business directory and consumer reviews portion of the Transport Reviews Website. Specifically, I understand that Reliable contends such infringing business names include “RCT Reliable Car Transport, LLC,” “Reliable Auto Shippers,” “Reliable Auto Transport Carriers” and “Reliable Elite Auto Carriers” (the “Other Reliable Companies”). Compl. at ¶ 17.

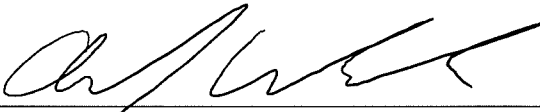
20. The Other Reliable Companies are only listed on the Transport Reviews Website because a consumer added the company to the industry directory

and submitted a review. Moving Sites did not add the Other Reliable Companies to the auto transport directory or the user reviews.

21. Moreover, Moving Sites is not connected with the Other Reliable Companies and has never earned money from the identification of the Other Reliable Companies on the Transport Reviews Website.

The matters stated in this declaration are true and accurate to the best of my personal knowledge. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: August 21, 2017



Andrew Wash

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21997390.1

Exhibit A



View 94 reviews on 4,140 Auto Transport Companies
Recently Shipped A Vehicle 209,995 Review Now (/AddReview/)

Company Search

Go

[MENU](#)

★ Pre-Screened Carriers ★ BBB A-Rated #1 CAR SHIPPING REVIEWS

\$500 in Free Peace of Mind Coverage!

SHEA CAR DIRECT

FREE QUOTE
CLICK HERE!



Company Name (required):

Email(required):

Phone Number (required):

Website

MC Number

Address 1

Address 2

City

State

-- Select a State --

ZipCode

Add Company



**Shipped Your
Car Yet?**

\$0 Deposit Car
Shipping—Damage Free
Guarantee—Free
Quote—Online Rate Estimator

[Home \(/\)](#) • [Site Map \(/About/SiteMap\)](#) • [Auto Transport Companies \(/Company/Directory/\)](#) • [Car Transport Quotes \(/Quotes/\)](#) • [Learn & Knowledge Center \(/Learn/\)](#) • [Contact Us \(/About/ContactUs/\)](#) • [Auto Transport Reviews By Date \(/Reviews/Archive\)](#)

The reviews posted on this site are posted by those who claim to be customers of the auto transport company that reviewed. Their opinions are theirs. Companies and visitors are responsible for deciding on companies indepent of the visitor information on Transport Reviews. Please alert us to potential false reviews or reviews not posted by a real customer. To report misuse of this site please contact us.

TransportReviews.com is a Community Site Proudly Operated By Moving Sites, LLC.

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Exhibit B



View 96 reviews on 4,140 Auto Transport Companies

Recently Shipped A Vehicle? Leave a Review 209,997 Review Now (/AddReview/)

Company Search

Go

MENU

Instant Quotes, Real Time

- ✓ No hidden fees
- ✓ Licensed, bonded, insured

GET QUOTE

EASY CAR SHIPPER
855-980-41

START

We've gathered links to our most requested content. Want to see them?

Show Me

Ratings & Reports

Featured

Top Rated Auto Transporters

[Past 2 Years \(/Reports/TopCompanies/2Years/\)](/Reports/TopCompanies/2Years/)

[Past 1 Year \(/Reports/TopCompanies/1Year/\)](/Reports/TopCompanies/1Year/)

[Past 30 Days \(/Reports/TopCompanies/30Days/\)](/Reports/TopCompanies/30Days/)

Remove Paid Reviews

[Past 2 Years \(/Reports/TopCompanies/2Years/HidePaid/\)](/Reports/TopCompanies/2Years/HidePaid/)

[Past 1 Year \(/Reports/TopCompanies/1Year/HidePaid/\)](/Reports/TopCompanies/1Year/HidePaid/)

[Past 30 Days \(/Reports/TopCompanies/30Days/HidePaid/\)](/Reports/TopCompanies/30Days/HidePaid/)

More

Companies By:

Location & Route:

[Office Location \(/Reports/OfficeLocation/SelectState/\)](#)

Type

[Broker/Carrier \(/Reports/BrokerCarrierReport/BrokerCarrier/GoldSilverBronze\)](#)

[Broker \(/Reports/BrokerCarrierReport/Broker/GoldSilverBronze\)](#)

[Carrier \(/Reports/BrokerCarrierReport/Carrier/GoldSilverBronze\)](#)

Recent Customer Reviews

Below are recent customer reviews of featured auto transport companies.

[Ship A Car Direct Was Great! \(/Company/Ship-A-Car-Direct/Reviews/318802/\)](#)

Review by Morgan on 8/21/2017 8:00 AM about **[Ship a Car Direct](#)**

[\(/Company/Ship-a-Car-Direct\)](#)

I was very happy with my overall experience. My main POC was responsive and the driver they connected me to was great, as well. The driver was even flexible on pick up and drop off location, as well. [\[More \(/Company/Ship-a-Car-Direct/Reviews/318802/\)\]](#)

[View \(/Company/Ship-a-Car-Direct/Reviews/318802/\)](#)

[View \(/Company/Ship-a-Car-Direct/Reviews/318802/\)](#)



Great Experience (</Company/Montway-Auto-Transport/Reviews/318801/>)

Review by Olivia on 8/21/2017 7:52 AM about **Montway Auto Transport**

(</Company/Montway-Auto-Transport/>)

Great experience from first contact, to the contact from the actual driver. Jeep was picked up and delivered within 2 days with no issues. Would highly recommend Montway and the pricing was very compe [\[More \(/Company/Montway-Auto-Transport/Reviews/318801/\)\]](/Company/Montway-Auto-Transport/Reviews/318801/)

[View \(/Company/Montway-Auto-Transport/Reviews/318801/\)](/Company/Montway-Auto-Transport/Reviews/318801/)

[View \(/Company/Montway-Auto-Transport/Reviews/318801/\)](/Company/Montway-Auto-Transport/Reviews/318801/)



83"

Auto Transportation (</Company/Ship-A-Car-Direct/Reviews/318800/>)

Review by Robett on 8/21/2017 7:33 AM about **Ship a Car Direct**

(</Company/Ship-a-Car-Direct/>)

Amazing Service - use without hesitation. Bruce was very professional and provided excellent communication. The driver was equally a professional and communicated very well through the entire process. [\[More \(/Company/Ship-a-Car-Direct/Reviews/318800/\)\]](/Company/Ship-a-Car-Direct/Reviews/318800/)

[View \(/Company/Ship-a-Car-Direct/Reviews/318800/\)](/Company/Ship-a-Car-Direct/Reviews/318800/)

[View \(/Company/Ship-a-Car-Direct/Reviews/318800/\)](#)



Childish (/Company/Navy-Auto-Transport/Reviews/318798/)

Review by Lynn on 8/21/2017 7:12 AM about [Navy Auto Transport \(/Company/Navy-Auto-Transport\)](#)

How does a company have great customer service one day, and the next completely ignore your calls? Then when I'm not comfortable with such actions, I go ahead and look for other companies that can tra [\[More \(/Company/Navy-Auto-Transport/Reviews/318798/\)\]](#)

[View \(/Company/Navy-Auto-Transport/Reviews/318798/\)](#)

[View \(/Company/Navy-Auto-Transport/Reviews/318798/\)](#)

[View More Newest Reviews \(/Reviews/NewestReviews/\)](#)

[View More Newest Reviews \(/Reviews/NewestReviews/\)](#)

[Ask Questions. Get Answers.](#)



Find Some Answers

Search



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